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March 21, 2022

*Via ECF*

The Honorable Judge Analisa Torres  
United States District Court, Southern District of New York  
500 Pearl Street, Room 15D  
New York, NY 10007

Re: *In re The Deposit Guarantee Fund (Ukraine)*, Case No. 21-mc-00203 (AT)

Dear Judge Torres:

We represent Applicant The Deposit Guarantee Fund (Ukraine).

We write in compliance with the order dated April 21, 2021, whereby this Court has granted the application for leave to conduct discovery from sixteen respondents pursuant to 28 U.S.C. § 1782, and has directed Applicant to "...file a status letter with the Court describing the status of its subpoenas and whether discovery is sufficiently complete to permit service on the potential defendants and certain individuals and entities associated with the potential defendant." (ECF No. 7.)

On December 17, 2021, this Court granted Applicant's letter-motion seeking permission to issue supplemental subpoenas to the respondents (ECF No. 17, the "Order").

Applicant has served all respondents with the supplemental subpoenas, in accordance with the Order.

Four respondents have yet to produce documents responsive to the supplemental subpoenas:

- Bank of America, N.A.'s time to answer has not expired yet because of an extension of time granted by Applicant;
- The Bank of New York Mellon has failed to produce documents within the agreed upon extended time to answer;

- UBS AG has also failed to produce documents within the agreed upon extended time to answer;
- The Clearing House Payments Company, LLC has not answered yet, consistent with its usual subpoena processing time.

Accordingly, discovery is not sufficiently complete to permit service on the potential defendants and certain individuals and entities associated with the potential defendants.

Respectfully submitted,

/s/\_\_\_\_\_

Berenice Le Diascorn